

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Deposition of Ethan Dornhelm in

Omar Santos and Amanda Clements on
behalf of themselves and all others similarly
situated,

Plaintiff,

v.

Healthcare Revenue Recovery Group, LLC
d/b/a ARS Account Resolution Services and
Experian Information Solutions, Inc.

Defendant.

3:21-mc-80008 KAW

Case No. ~~1:19-cv-23084-KMW (District
Court Southern District of Florida, Miami
Division)~~

**STIPULATED PROTECTIVE ORDER
REGARDING DEPOSITION OF
ETHAN DORNHELM**

Pursuant to Rules 26(c) and 45(d)(3) of the Federal Rules of Civil Procedure, non-party witness Ethan Dornhelm (“Dornhelm”), and Omar Santos and Amanda Clements (“Plaintiffs”) (collectively, the “Parties”) enter into this Stipulated Protective Order in connection with a subpoena issued by plaintiffs to take the deposition of Dornhelm in this District (the “Subpoena”), to be used in *Santos, et al. v. Healthcare Revenue Recovery Grp. LLC et al*, No. 1:19-cv-23084-KMW (S.D. Fla. Miami Division) (the “Underlying Action”). The protections provided by this Stipulated Protective Order are in addition to, and not in lieu of, the Protective Order in the Underlying Action. (See *Santos, et al. v. Healthcare Revenue Recovery Grp. LLC et al*, No. 1:19-cv-23084-KMW, ECF No. 38-1 (Jan. 7, 2020).

The Parties agree that to prevent the imposition of undue burden and expense, annoyance, embarrassment, or oppression on non-party Dornhelm, and to prevent the disclosure of trade secrets or other confidential research, development, or commercial information belonging to Dornhelm’s employer, FICO, which has not been served with any subpoena, good cause exists to limit a deposition of Dornhelm to specific topics, and that any deposition of Dornhelm shall be limited to examination of the following topics (“Topics”):

1
2 1. The different roles played by FICO, Experian, and those who request credit reports,
3 with respect to the calculation of FICO scores and the preparation and delivery of credit reports.

4 2. Through what method or procedures does Experian provide data on Collection
5 Accounts (as defined in Paragraph 4 of the Dornhelm Declaration) to FICO.

6 3. Whether "Date of Status" and "Date Open" fields for Collection Accounts are
7 utilized by the FICO score.

8 4. Knowledge of the contents of the Declaration signed by Dornhelm on April 20,
9 2020 in the Underlying Action (the "Dornhelm Declaration").


10 5. The effect of payment history, or the lack thereof, on Collection Accounts reported
11 by Experian and whether it can affect a consumer's FICO score.

12
13 The Parties agree that any questions to Dornhelm on matters outside of the Topics are
14 outside the proper scope of the deposition, that Dornhelm's counsel may instruct Dornhelm not to
15 answer such questions, and that Dornhelm shall not be required to answer such questions. If
16 Plaintiffs repeatedly attempt to examine Dornhelm on matters outside of the Topics, Dornhelm
17 may terminate the deposition in complete satisfaction of his obligations under the Subpoena.

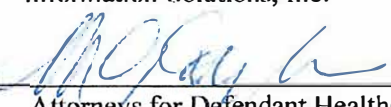
18
19 The Parties agree that no party or non-party may use information obtained in this litigation
20 for any purpose except the litigation.


21 By stipulating to the entry of this Protective Order no Party waives any right it otherwise
22 would have to object to disclosing or producing any information or item on any ground not
23 addressed in this Stipulated Protective Order. Similarly, no Party waives any right to object on any
24 ground to use in evidence any of the material covered by this Stipulated Protective Order. The
25 Parties reserve all other rights in full to the extent not expressly addressed in this Stipulated
26 Protective Order.
27
28

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 DATED: 1/13/2021 
3 Attorneys for Plaintiff

4 DATED: _____
5 Attorneys for Defendant Experian
6 Information Solutions, Inc.

7 DATED: 1/12/2021 
8 Attorneys for Defendant Healthcare
9 Revenue Recovery Group, LLC

10 DATED: 1/13/2021 
11 Attorneys for Non-Party Ethan Dornhelm

12 ~~PURSUANT TO STIPULATION, IT IS SO ORDERED.~~

13
14 DATED: _____
15 ~~United States District/Magistrate Judge~~

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2
3 DATED: _____ Attorneys for Plaintiff

4 DATED: 1/13/21 *Neil Taylor*
5 Attorneys for Defendant Experian
6 Information Solutions, Inc.

7 DATED: _____ Attorneys for Defendant Healthcare
8 Revenue Recovery Group, LLC

9
10 DATED: _____ Attorneys for Non-Party Ethan Dornhelm

11
12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

13
14 DATED: January 20, 2021
15 United States _____ Judge

